



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 18 2000

4WD-RPB

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Follow-up on Site Visit
Grenada Manufacturing, LLC
Grenada, Mississippi
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The purpose of this letter is to confirm discussions held during the site visit, April 25 and 26, 2000, between representatives of Grenada Manufacturing, the US Environmental Protection Agency (EPA), and the Mississippi Department of Environmental Quality (MDEQ). The visit allowed for interactive discussion of corrective action measures in general and the facility's approach to interim corrective action measures imposed by EPA on April 14, 2000. Enclosed are several documents that EPA promised to send to the facility.

In our discussions, it was agreed that the Interim Measures Plan would address SWMUs 13, 14 and 15; AOCs A and B; and Site-wide Groundwater Corrective Action. It was generally agreed that the facility would undertake practical measures to contain and confine the groundwater plumes of TCE, toluene, and chromium. This will include source removal where necessary. Remediation may not be limited to the three contaminants above, but may include other organic contaminants and metals as well.

EPA asked the facility to develop a schedule for closure of the Chromium Destruct Pit (SWMU 14), for testing of soil around the unit for possible removal and to develop a plan for removal of these contaminated materials. EPA recommends including the Chromium Acid baths in the production line in this process of testing, decontamination and/or removal. If a release from the production area is suspected and/or confirmed, EPA can call these units Areas of Concern and compel testing and cleanup. It would be better if the facility voluntarily included these areas in its closure/cleanup of the similarly constructed Chromium Destruct Pit.

EPA is also concerned that pockets of DNAPL remain in the soil and/or groundwater at the facility from the spill of 10,000-12,000 gallons of TCE around 1981. The facility should consider as an interim measure, restarting and/or relocating the product recovery operations that were put into effect in earlier years. Any other interim measures that the facility proposes will be given consideration.

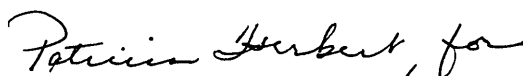
Docket Number 456417

During the tour of the plant and grounds, EPA and MDEQ noticed several situations related primarily to housekeeping, that may require further attention. The purpose of EPA's visit was not a compliance/enforcement inspection, and no notices of violations will be issued. Specific concerns, which were noted and discussed, are as follows:

- 1) On the first day of the visit EPA and MSDEQ observed an open hazardous waste drum in the TCE recovery area that was not labeled. An old corroded waste drum had been left open nearby. By the morning of the second day the facility had started to correct these situations.
- 2) One of the toluene recovery wells was lacking a cap. None of the four wells were locked or labeled. There was a great deal of scrap metal and other debris lying around that could have been accidentally or purposefully introduced into the wells.
- 3) Some drips to the flooring or releases of what appeared to be steam, and pieces of stamped metal on the floor were observed. Secondary containment, i.e., trays are recommended wherever drips or spills from industrial processes can occur. These sorts of drips or spills can create Solid Waste Management Units if allowed to go unchecked.
- 4) A good deal of scrap metal lying on the ground was observed outside the plant. Laydown yards can pose problems if the metals or machinery left in the open release solvents, metals, or oils.

On behalf of the EPA and MDEQ project managers, I want to thank the facility, its representatives and consultants for their cooperation in making the site visit a productive one. If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469 or Ms. Lael Butler, Corrective Action Specialist, at (404) 562-8453.

Sincerely,



Narindar M. Kumar,
Chief, RCRA Programs Branch
Waste Management Division

Enclosures

cc: Louis Crawford, MDEQ
John Devic, Textron Automotive
John Bozick, Meritor Automotive

Textron Automotive

Donald Webster

To: Laura Fowler/R4/USEPA/US@EPA

05/17/2000 02:15 PM

cc:

Subject: Textron Addresses

Laura;

Here are some addresses you will need for a letter coming to you.

Louis Crawford
MDEQ
P.O. Box 10385
Jackson, MS 39289

John Devic
Textron Automotive Co.
750 Stephenson Hwy.
Troy, Michigan 48083

John Bozick
Meritor Automotive
2135 West Maple rd
Troy, Michigan 48084-7186

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Sincerely,

Narindar M. Kumar,
Chief, RCRA Programs Branch
Waste Management Division

Webster

 5/17/00

McCurry

 5/17

Kumar

 5/17

4WD-RPB

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

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610 FORD STREET

ATLANTA, GEORGIA 30303-8960

Donald Webster

04/13/00 05:49 PM

cc:

Subject: Notes to Self

1. **SWMU 7- Outfall Ditch:** At this SWMU, the reported levels of Chromium in the surface water exceeded the National Recommended Water Quality Criteria. TCE exceeded the recommended levels for human consumption by an order of magnitude or more. Is a warning against human consumption posted at Riverdale Creek? However, sediment samples did not exceed RBCs for total Chromium and an ecological screening level for TCE in sediment has not been calculated. EPA is concerned about the continued release of TCE and Chromium in the effluent from the waste water treatment facility, and will inquire at the MDEQ Water Branch what effect these exceedences of the National Recommended Water Standards may have on compliance with the facility's NPDES permit. EPA cannot grant no further action status for this SWMU at this time, but does not require this SWMU to be included in Interim Measures.

Comment: The facility is maintaining compliance with our NPDES permit limits of 0.03 mg/L monthly average of Hexavalent Chrome and 0.35 mg/L Monthly Average of Total Chromium. Use of TCE at the facility was discontinued in the early 1990's. The data referenced appear to be from the early 1990's before discontinuance of TCE and close looping the chrome wastewater system.

I was looking at table under SWMU 7 in SOWI. It appeared to me that values exceeded Chronic screening values. Not sure of date of this data, but the TCE values referenced in table A from 1997 do not exceed the FW screening values (acute 528ug/l chronic 84ug/l).

If I was looking at data from 1990, Don Williams may be right. This could make NFA OK for this SWMU. Another good reason to get these Screening levels onto the tables with the data! And, I need dates for the data referenced in the SOWI.

Enclosed is a general diagram of water used in the plant. The detailed diagram I had got deleted when my hard drive crashed. I will recreate it and send it to you. These should give you a basic idea of how the water flows in the facility.

Don Williams



- RFC-822-headers:

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with ESMTP id <OFSY00HUJQO49R@epamail.epa.gov> for
donald_webster%region4@ccmail.epamail.epa.gov
(ORCPT rfc822;Webster.Donald@epamail.epa.gov); Thu,
13 Apr 2000 12:21:03 -0400 (EDT)

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hu,

13 Apr 2000 11:14:30 -0500

Content-return: allowed

Date: Thu, 13 Apr 2000 11:14:30 -0500

From: Don Williams <dwilliams@grenadamfg.com>

Subject:

To: "Don Webster (E-mail)" <Webster.Donald@epamail.epa.gov>

Message-id: <3D2DB3956E82D311A2E10080C8E0F40502705C@GMCBDC>

MIME-version: 1.0

X-Mailer: Internet Mail Service (5.0.1457.3)

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X-Priority: 3



- Water



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

Toll-free 1-800-452-5761
61 Forsyth Street, N.E.
Atlanta, Georgia 30303-8960

Donald Webster

04/11/00 10:39 AM

cc:
Subject: Screening Values and Interim Measures

Don;

Thought you could use the attached references so you can see where we are getting the numbers we are referencing. If you have any trouble locating the documents give me a call. These references contain the actual screening numbers that we compare to your values, to determine if cleanup or interim measures need to be started.

Region 3 Risk Menu is:

<http://www.epa.gov/reg3hwmd/risk/riskmenu.htm>-from here we take our industrial soil screening numbers.

MCLs come from <http://www.epa.gov/safewater/mcl.html>-from here we get the groundwater cleanup values.

Sediment screening numbers can be found at <http://www.epa.gov/region4/wastepgs/oftecser/ecolbul.htm>.

Surface water screening numbers can be found at <http://www.epa.gov/region4/water/wqs/intrhp.htm>. See Kevin Koporec's response for below for this item.

The letter imposing Interim Measures has been given to our Branch Chief for signing. Your permit only gives you thirty days for an Interim Measures Workplan. My letter cannot say sixty. This is how EPA works. We stall around for a year or two and then lay something major on you with a short deadline. Actually, we're making pretty good progress on your facility considering your HSWA permit was written in 1998.

I'm trying to give you enough advance warning so that you can prepare. I just hope all the stakeholders in your cleanup are cooperative. Our approach is to work on corrective action for situations that are most threatening to human health, the environment and groundwater. I feel like if you came up with an Interim Measures plan that addressed groundwater corrective action at the entire facility, you would be ahead of the game. By this I mean the TCE plumes and the Cr plumes would need to be addressed as well as sources eliminated; you would be taking a substantial step forward on interim measures and HSWA corrective action at the same time. Killing two birds with one stone so to speak.

As I mentioned on the phone, SWMU 7 is no longer part of interim measures. IMs are imposed on SWMUs 12, 14, 15 and AOCs A & B. Also, the reason EPA is requiring indoor air testing is that TCE

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and daughters are often being found inside buildings where groundwater is contaminated. I'm not saying this is a problem at your facility. Just that we should rule it in or out. If nothing is found, we probably won't ask you to do it again.

Call me if you have any questions or comments. As soon as the Branch Chief concurs, I will E-mail a copy of the letter and final comments to you.

Sincerely, Don

Reply Separator

Subject: eco screening values

Author: Donald Webster at REGION4

Date: 3/31/2000 3:08 PM

Here's a communication you can pass along to your section if you want to. The National Water Quality Criteria can be found on our Water Division's web page at:

<http://www.epa.gov/region4/water/wqs/intrhp.htm>

The preceeding, as modified by Kevin's statement below, are Screening levels for Surface Water.

Ecological screening levels for sediment can be found at the web address given below by Kevin.

With these two, and the human RBCs on R-3 website, and the MCLs on our Drinking Water program's website a person should have all that is available for screening levels for contaminants to evaluate the need for cleanup.

I just had to use all four sources in evaluating the need for cleanup at a MS facility, so I am passing them along to everyone.

Don

Forward Header

Subject: eco screening values

Author: Kevin Koporec at REGION4

Date: 3/31/2000 9:58 AM

Don- After I spoke with you I spoke with Lynn Wellman. He clarified an important issue that I need to pass onto you. Lynn and the rest of our Eco risk folks prefer the region 4 screening values/criteria over the National Values. A big concern the region (other regions also, according to Lynn) has with the National values is that they are said to be for dissolved chemical in the water; Region 4 prefers to evaluate data of total chemical (unfiltered) concentrations especially at the screening step. The website address below is where you can find the region 4 ecological screening values. If you have exceedances of the



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Svs or want to talk further about eco risk otherwise, I would encourage you to speak with Lynn Wellman, Sharon Thoms, or Linda George here in OTS.

thanks,
Kevin

<http://www.epa.gov/region4/wastepgs/oftecser/ecolbul.htm>